



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

C.A. No. 12-1411-GMS

KAROLINA KARPOV)

Plaintiff,)

-v-)

VLADIMIR KARPOV)

SVETLANA KARPOV)

KRISTINA MULTANI)

VICTORIA KRYACHKOV)

EMILY KARPOV)

Defendants.)

OBJECTION TO COURT'S
JURISDICTION OVER DEFENDANT
VICTORIA KRYACHKOV

Defendant, Victoria Kryachkov (hereinafter referred to as "Defendant"), hereby responds to Plaintiff's Complaint (the "Complaint"), as follows:

The Complaint Filed by Plaintiff, Karolina Karpov in the US District Court of Delaware:

1. The Plaintiff's complaint and summons against me has never been sent to me in any form.

If a defendant is not served within 120 days after the complaint is filed, the court—on motion or on its own after notice to the plaintiff—must dismiss the action without prejudice against that defendant or order that service be made within a specified time. FRCP 4(m).

2. I do not have any complaint or summons against me, in writing, which was supposedly filed in this court.
3. All I received is an Outline to how the Case has been progressing, which included my name in it as Defendant, which also included Emily Karpov, and Kristina Multani (*nee* Karpov).

Affirmative Defenses

1. The Plaintiff's Complaint fails to state claims upon which relief can be granted by Defendant Victoria Kryachkov.

2. The Plaintiff, as well as the US District Court, in the District of Delaware, can exercise no personal jurisdiction over Defendant since no contact with the State of Delaware is made by defendant.

The Defendant is not/ has not:

- A. Present in the State of Delaware
- B. Domiciled nor residing within the State of Delaware
- C. Consenting to be sued within the State of Delaware
- D. Driving with in the State of Delaware
- E. Committed any tortious acts within the State of Delaware
- F. Had any ownership of any property(ies) in the State of Delaware
- G. Conducting business in the State of Delaware
- H. Being married in nor is currently living in while married in the State of Delaware.

In General. Serving a summons or filing a waiver of service establishes personal jurisdiction over a defendant: who is subject to the jurisdiction of a court of general jurisdiction in the state where the district court is located; who is a party joined under Rule 14 or 19 and is served within a judicial district of the United States and not more than 100 miles from where the summons was issued; or when authorized by a federal statute. FRCP 4(k)(1)(A)(B)(C).

None of the above mentioned criteria have been satisfied.

WHEREFORE, judgment is demanded dismissing the Complaint against the Defendant, with prejudice, with costs and disbursements, including such other and further relief as this Court may deem just and proper.

Dated: SET FORTH Lincoln, Nebraska

February 13, 2013

Notary

Mohammad S Khalil

Notary Signature

Victoria E Kryachkov

Victoria E Kryachkov

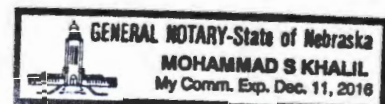
PO Box 80245

LINCOLN, NE 68501

(For Privacy and Security Reasons. Phone # available to Court House Only, Upon Written Request)

My Commission Expires: 12/11/2016 (SEAL)

Notary Printed Name: Mohammad S Khalil



Victoria Knyachenkov
PO Box 80245
Lincoln, NE 68501

Clerk of Court
US District Court of Delaware
844 N King St
Wilmington, DE 19801



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